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FEDERAL COMMUNICATIONS COMMISSION
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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

In the Matter of	)	
	)	
Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers	))))	CC Docket No. 95-185

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COMMENTS

SouthEast Telephone Limited Partnership, Ltd. ("SouthEast"), by its attorney, hereby submits the following comments in the proceeding.[1] Currently pending before the Commission is a proposal to preempt state regulation of local exchange carriers ("LECs") and to establish a scheme of reciprocal termination of traffic, otherwise known as "bill-and-keep." Each carrier under this plan has the obligation to terminate the other carrier's traffic without additional charge -- regardless of whether the call originated from an LEC or a Commercial Mobile Radio Service ("CMRS") provider. SouthEast fully supports this proposal.

SouthEast urges the Commission to adopt a reciprocal termination policy between LECs and CMRS providers. This policy will avoid complex and costly settlement process, and will also result in increased local competition, lower wireless fees to consumers, regulatory parity between competitors, and an expansion of economic opportunity for all telecommunications providers.

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[1] On January 11, 1996 the Commission released a Notice of Proposed Rulemaking in the above-captioned docket. Subsequently, the Commission released an Order and Supplemental Notice of Proposed Rulemaking on February 16, 1996, requesting additional comments in light of the enactment of the Telecommunications Act of 1996, Pub. L. No. 104-104 (1996).

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Both Congress and the FCC have indicated that their goal is to replace the regulated monopoly model with a competitive telecommunications model. The wireless industry cannot compete effectively with LECs to provide local service if the typical wireline consumer must pay the LEC just for wireless access charges. The current system requires CMRS providers to pay LECs for delivering calls to landline phones which originate on mobile phones. However, LECs pay wireless carriers nothing for delivering landline calls to mobile phones. Such a scheme creates a barrier to the full development of wireless as a competitive local service, and increases the cost of wireless service to the consumer.

Moreover, reciprocal termination has already proven to be successful, as evidenced by the current relationship between LECs. By adopting the bill-and-keep methodology that neighboring local telephone companies have used for decades, this plan would save consumers the passed-through costs of expensive battles of lawyers, accountants, and economists in lengthy proceedings to set the "right price." Competitive telecommunications is rooted in the concept of parity -- if it is a good policy to apply to one competitor, then it is a good policy to apply to all competitors. The recent decisions of the Commission have been to eliminate the gaming whereby one competitor uses regulatory policy to gain a competitive advantage against another. The Commission should adopt the proposed reciprocal termination policy to foster competition in the telecommunications industry, and to simplify the current system.

Respectfully submitted,

SOUTHEAST TELEPHONE LIMITED
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Certificate of Service

I, Nichelle Rudd, hereby certify that on this 4th day of March, 1996, a true and correct copy of the foregoing "Comments" was sent by first class mail to:

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